

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:	)	
	)	PROMESA
THE FINANCIAL OVERSIGHT AND	)	Title III
MANAGEMENT BOARD FOR PUERTO RICO	)	
	)	Case No. 17-bk-03283 (LTS)
as representative of	)	
	)	<b>Re: ECF No. 12446</b>
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>	)	
	)	
Debtors. <sup>1</sup>	)	
	)	
	X	
In re:	)	PROMESA
	)	Title III
THE FINANCIAL OVERSIGHT AND	)	
MANAGEMENT BOARD FOR PUERTO RICO,	)	Case No. 17-cv-01685 (LTS)
	)	Case No. 17-bk-03566 (LTS)
as representative of	)	
	)	<b>Re: ECF No. 838</b>
THE EMPLOYEES RETIREMENT SYSTEM OF THE	)	
GOVERNMENT OF THE COMMONWEALTH OF	)	<i>This Pleading Relates to the</i>
PUERTO RICO,	)	<i>Commonwealth and ERS Only,</i>
	)	<i>and Should Be Filed in Both</i>
Debtor.	)	<i>Dockets.</i>
	)	
	X	

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO; THE SPECIAL CLAIMS COMMITTEE OF THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, ACTING BY AND THROUGH ITS MEMBERS; THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF ALL TITLE III DEBTORS (OTHER THAN COFINA); THE OFFICIAL COMMITTEE OF RETIRED EMPLOYEES OF THE COMMONWEALTH OF PUERTO RICO; ANDALUSIAN GLOBAL DESIGNATED ACTIVITY COMPANY, CROWN MANAGED ACCOUNTS FOR AND ON BEHALF OF CROWN/PW SP, GLENDON OPPORTUNITIES FUND, L.P., LMA SPC FOR AND ON BEHALF OF MAP 98 SEGREGATED PORTFOLIO, MASON CAPITAL MASTER FUND L.P., OAKTREE-FORREST MULTI-STRATEGY, LLC (SERIES B), OAKTREE OPPORTUNITIES FUND IX, L.P., OAKTREE OPPORTUNITIES FUND IX (PARALLEL), L.P., OAKTREE OPPORTUNITIES FUND IX (PARALLEL 2), L.P., OAKTREE HUNTINGTON INVESTMENT FUND II, L.P., OAKTREE OPPORTUNITIES FUND X, L.P., OAKTREE OPPORTUNITIES FUND X (PARALLEL), L.P., OAKTREE OPPORTUNITIES FUND X (PARALLEL 2), L.P., OAKTREE VALUE OPPORTUNITIES FUND HOLDINGS, L.P., OCEANA MASTER FUND LTD., OCHER ROSE, L.L.C., PENTWATER MERGER ARBITRAGE MASTER FUND LTD., PWCM MASTER FUND LTD., REDWOOD MASTER FUND, LTD., SV CREDIT, L.P, PUERTO RICO AAA PORTFOLIO BOND FUND, INC., PUERTO RICO AAA PORTFOLIO BOND FUND II, INC., PUERTO RICO AAA PORTFOLIO TARGET MATURITY FUND, INC., PUERTO RICO FIXED INCOME FUND, INC., PUERTO RICO FIXED INCOME FUND II, INC., PUERTO RICO FIXED INCOME FUND III, INC., PUERTO RICO FIXED INCOME FUND IV, INC., PUERTO RICO FIXED INCOME FUND V, INC., PUERTO RICO GNMA & U.S. GOVERNMENT TARGET MATURITY FUND, INC., PUERTO RICO INVESTORS BOND FUND I, PUERTO RICO

INVESTORS TAX-FREE FUND, INC., PUERTO RICO INVESTORS TAX-FREE FUND, INC. II, PUERTO RICO INVESTORS TAX-FREE FUND III, INC., PUERTO RICO INVESTORS TAX-FREE FUND IV, INC., PUERTO RICO INVESTORS TAX-FREE FUND V, INC., PUERTO RICO INVESTORS TAX-FREE FUND VI, INC., PUERTO RICO MORTGAGE-BACKED & U.S. GOVERNMENT SECURITIES FUND, INC., TAX-FREE PUERTO RICO FUND, INC., TAX-FREE PUERTO RICO FUND II, INC., TAX-FREE PUERTO RICO TARGET MATURITY FUND, INC.; and THE BANK OF NEW YORK MELLON, AS FISCAL AGENT FOR THE ERS BONDS,

Movants.

**JOINT URGENT MOTION TO MODIFY THE SCHEDULE FOR RESOLUTION OF THE ERS BONDHOLDER CLAIMS AND ADMINISTRATIVE EXPENSE MOTIONS**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors (the “Creditors’ Committee”),<sup>2</sup> the Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the “Retiree Committee” and, together with the Creditors’ Committee, the “Committees”), the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), the Special Claims Committee of the Financial Oversight and Management Board for Puerto Rico (the “SCC”), the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF” and, together with the Oversight Board and the SCC, the “Government Parties”), certain groups of ERS Bondholders represented by Jones Day and White & Case LLP (the “ERS Bondholder Groups”),<sup>3</sup> and The Bank

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<sup>2</sup> The Creditors’ Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

<sup>3</sup> Andalusian Global Designated Activity Company, Crown Managed Accounts for and on behalf of Crown/PW SP, Glendon Opportunities Fund, L.P., LMA SPC for and on behalf of Map 98 Segregated Portfolio, Mason Capital Master Fund L.P., Oaktree-Forrest Multi-Strategy, LLC (Series B), Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel), L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Oaktree Huntington Investment Fund II, L.P.,

of New York Mellon, as Fiscal Agent for the ERS bonds (the “Fiscal Agent” and, together with the ERS Bondholder Groups, the Committees, and the Government Parties, the “Parties”) hereby file this *Urgent Joint Motion to Modify the Schedule for Resolution of the ERS Bondholder Claims and Administrative Expense Motions* (the “Motion”). In support of this Motion, the Parties respectfully state as follows:

### **JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction over this matter under PROMESA section 306(a), 48 U.S.C. § 2166(a), and venue is proper under PROMESA section 307(a), 48 U.S.C. § 2167(a).

### **BACKGROUND**

2. On March 18, 2020, this Court entered an Order Granting Urgent Joint Motion for Entry of a Schedule for Resolution of the ERS Bondholder Claims and Administrative Expense Motions [ECF No. 12446 in Case No. 17-3283; ECF No. 838 in Case No. 17-3566] (the “Scheduling Order”).

3. On March 25, 2020, the ERS Bondholder Groups and the Fiscal Agent filed

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Oaktree Opportunities Fund X, L.P., Oaktree Opportunities Fund X (Parallel), L.P., Oaktree Opportunities Fund X (Parallel 2), L.P., Oaktree Value Opportunities Fund Holdings, L.P., Oceana Master Fund Ltd., Ocher Rose, L.L.C., Pentwater Merger Arbitrage Master Fund Ltd., PWCM Master Fund Ltd., Redwood Master Fund, Ltd., SV Credit, L.P., Puerto Rico AAA Portfolio Bond Fund, Inc., Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc., Puerto Rico Fixed Income Fund, Inc., Puerto Rico Fixed Income Fund II, Inc., Puerto Rico Fixed Income Fund III, Inc., Puerto Rico Fixed Income Fund IV, Inc., Puerto Rico Fixed Income Fund V, Inc., Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc., Puerto Rico Investors Bond Fund I, Puerto Rico Investors Tax-Free Fund, Inc., Puerto Rico Investors Tax-Free Fund, Inc. II, Puerto Rico Investors Tax-Free Fund III, Inc., Puerto Rico Investors Tax-Free Fund IV, Inc., Puerto Rico Investors Tax-Free Fund V, Inc., Puerto Rico Investors Tax-Free Fund VI, Inc., Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc., Tax-Free Puerto Rico Fund, Inc., Tax-Free Puerto Rico Fund II, Inc., and Tax-Free Puerto Rico Target Maturity Fund, Inc..

supplements to their administrative expense motions [ECF No. 12536 in Case No. 17-bk-3283; ECF No. 848 in Case No. 17-bk-3566] (the “Supplements”).

4. On April 15, 2020, following a meet-and-confer by email, the Parties agreed to (a) a two-week extension of time for the Government Parties and Committees to file Rule 12(b) motions to dismiss the ERS Bondholders’ and Fiscal Agent’s Claims<sup>4</sup> and Administrative Expense Motions<sup>5</sup>; (b) a two-week extension for the ERS Bondholder Groups and the Fiscal Agent to file Rule 12(c) motions pertaining to the Claims and Administrative Expense Motions; and (c) corresponding extensions of the associated deadlines.

#### **RELIEF REQUESTED**

5. The Parties jointly request entry of a modified schedule for resolution of the ERS Bondholder Claims and Administrative Expense Motions as follows:

Event	Prior Ordered Date	Proposed New Dates
Deadline for Government Parties and Committees to file Rule 12(b) motions to dismiss the Claims and the Administrative Expense Motions	4/22/2020	5/6/2020
Deadline for Government Parties and Committees to respond to initial	4/29/2020	5/13/2020

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<sup>4</sup> The Claims are identified in Appendix 2 to the Parties’ prior motion. ECF No. 12429-1 in Case No. 17-bk-3283; ECF No. 836-1 in Case No. 17-bk-3566.

<sup>5</sup> The Administrative Expense Motions are (i) the ERS Bondholders’ Motion and Request for Allowance and Payment of Post-Petition and Administrative Expense Claims [ECF No. 9285 in Case No. 17-3283 and ECF No. 707 in Case No. 17-3566], (ii) the ERS Bondholders’ Motion and Request for Allowance and Payment of Post-Petition and Administrative Expense Claims [ECF No. 9294 in Case No. 17-3283 and ECF No. 710 in Case No. 17-3566] (collectively, the “Bondholder Administrative Expense Motions”), and (iii) the Joinder of The Bank of New York Mellon, as Fiscal Agent, in ERS Bondholders’ Motion for Allowance of Administrative Expense Claim [ECF No. 9298 in Case No. 17-3283 and ECF No. 712 in Case No. 17-3566] (the “BNYM Joinder” and, together with the Bondholder Administrative Expense Motions, the “Administrative Expense Motions”).

Event	Prior Ordered Date	Proposed New Dates
document requests with written responses and objections		
Deadline for Non-Party Participants to file Rule 12(b) motions to dismiss the Claims and the Administrative Expense Motions or joinders to such Rule 12(b) motions	4/29/2020	5/13/2020
Deadline for ERS Bondholder Groups and the Fiscal Agent to file Rule 12(c) motions	5/13/2020	6/10/2020
Deadline for Non-Party Participants to file Rule 12(c) motions or joinders to Rule 12 (c) motions	5/20/2020	6/17/2020
Deadline for ERS Bondholder Groups and the Fiscal Agent to file oppositions to any Rule 12(b) motions	5/20/2020	6/17/2020
Deadline for Non-Party Participants to file responses or joinders to oppositions to Rule 12(b) motions	5/27/2020	6/24/2020
Deadline for Government Parties and Committees to file opposition to ERS Bondholder Groups and the Fiscal Agent Rule 12(c) motions	6/10/2020	7/8/2020
Deadline for Non-Party Participants to file responses or joinders to oppositions to Rule 12(c) motions	6/17/2020	7/15/2020
Deadline for Government Parties and Committees to file replies in support of any Rule 12(b) motions	6/17/2020	7/15/2020
Deadline for Non-Party Participants to file responses or joinders to replies in support of any Rule 12(b) motions	6/24/2020	7/22/2020
Deadline for ERS Bondholder Groups and the Fiscal Agent to file replies in support of any Rule 12(c) motions	7/9/2020	8/6/2020
Deadline for Non-Party Participants to file responses or joinders to replies in support of any Rule 12(c) motions	7/16/2020	8/13/2020
Hearing on Rule 12 motions	Date Set by Court	Date Set by Court

Event	Prior Ordered Date	Proposed New Dates
Deadline for completion of document discovery	30 Days After Decision on Rule 12 Motions	30 Days After Decision on Rule 12 Motions
Subsequent to the court's ruling on the Rule 12 motions, the parties are to meet and confer regarding a schedule for any further litigation necessary to fully resolve the Claims and the Administrative Expense Motions	TBD	TBD

6. The Parties respectfully submit that good cause exists to grant the Motion. The Government Parties and Committees require additional time to prepare Rule 12(b) motions to dismiss the numerous additional theories identified in the Supplements, and additional time to coordinate their filings to be as efficient as possible given the number of claims and theories involved. The ERS Bondholder Groups and the Fiscal Agent in turn request a reciprocal extension to prepare Rule 12(c) motions. Additionally, due to the COVID-19 outbreak and the imposition of a curfew in Puerto Rico, ERS requires additional time to respond to document requests served by the ERS Bondholder Groups and the Fiscal Agent on April 15, 2020.

7. For the foregoing reasons, the Parties respectfully request that the Court enter an order substantially in the form of the attached as Exhibit A (the "Proposed Order") modifying the schedule to resolve the Claims and Administrative Expense Motions.

**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 9013-1 AND THE ELEVENTH AMENDED CASE MANAGEMENT PROCEDURES**

8. Pursuant to Local Rule 9013-1 and ¶ I.H of the Eleventh Amended Case Management Order, the undersigned hereby certify that counsel has carefully examined the matter and concluded that there is a true need for expedited consideration of this motion and that the

Parties have not created the urgency through lack of due diligence on its part. The undersigned further certify that the Parties made a bona fide, reasonable, and good faith effort to resolve the issues addressed in this motion prior to filing. The Parties jointly request the Court grant the Motion.

Dated: April 17, 2020  
New York, NY

Respectfully submitted,

/s/ Alfredo Fernández-Martínez

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*Official Committee of Unsecured Creditors*

**Exhibit A**

**Proposed Order**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:	)	
	)	PROMESA
THE FINANCIAL OVERSIGHT AND	)	Title III
MANAGEMENT BOARD FOR PUERTO RICO	)	
	)	Case No. 17-bk-03283 (LTS)
as representative of	)	
	)	<b>Re: ECF No. 12446</b>
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>	)	
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Debtors. <sup>6</sup>	)	
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In re:	)	PROMESA
	)	Title III
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THE FINANCIAL OVERSIGHT AND	)	Case No. 17-cv-01685 (LTS)
MANAGEMENT BOARD FOR PUERTO RICO,	)	Case No. 17-bk-03566 (LTS)
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as representative of	)	<b>Re: ECF No. 838</b>
	)	
THE EMPLOYEES RETIREMENT SYSTEM OF THE	)	<i>This Pleading Relates to the</i>
GOVERNMENT OF THE COMMONWEALTH OF	)	<i>Commonwealth and ERS Only,</i>
PUERTO RICO,	)	<i>and Should Be Filed in Both</i>
	)	<i>Dockets.</i>
Debtor.	)	
	)	
	X	

<sup>6</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO; THE SPECIAL CLAIMS COMMITTEE OF THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, ACTING BY AND THROUGH ITS MEMBERS; THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF ALL TITLE III DEBTORS (OTHER THAN COFINA); THE OFFICIAL COMMITTEE OF RETIRED EMPLOYEES OF THE COMMONWEALTH OF PUERTO RICO; ANDALUSIAN GLOBAL DESIGNATED ACTIVITY COMPANY, CROWN MANAGED ACCOUNTS FOR AND ON BEHALF OF CROWN/PW SP, GLENDON OPPORTUNITIES FUND, L.P., LMA SPC FOR AND ON BEHALF OF MAP 98 SEGREGATED PORTFOLIO, MASON CAPITAL MASTER FUND L.P., OAKTREE-FORREST MULTI-STRATEGY, LLC (SERIES B), OAKTREE OPPORTUNITIES FUND IX, L.P., OAKTREE OPPORTUNITIES FUND IX (PARALLEL), L.P., OAKTREE OPPORTUNITIES FUND IX (PARALLEL 2), L.P., OAKTREE HUNTINGTON INVESTMENT FUND II, L.P., OAKTREE OPPORTUNITIES FUND X, L.P., OAKTREE OPPORTUNITIES FUND X (PARALLEL), L.P., OAKTREE OPPORTUNITIES FUND X (PARALLEL 2), L.P., OAKTREE VALUE OPPORTUNITIES FUND HOLDINGS, L.P., OCEANA MASTER FUND LTD., OCHER ROSE, L.L.C., PENTWATER MERGER ARBITRAGE MASTER FUND LTD., PWCM MASTER FUND LTD., REDWOOD MASTER FUND, LTD., SV CREDIT, L.P, PUERTO RICO AAA PORTFOLIO BOND FUND, INC., PUERTO RICO AAA PORTFOLIO BOND FUND II, INC., PUERTO RICO AAA PORTFOLIO TARGET MATURITY FUND, INC., PUERTO RICO FIXED INCOME FUND, INC., PUERTO RICO FIXED INCOME FUND II, INC., PUERTO RICO FIXED INCOME FUND III, INC., PUERTO RICO FIXED INCOME FUND IV, INC., PUERTO RICO FIXED INCOME FUND V, INC., PUERTO RICO GNMA & U.S. GOVERNMENT TARGET MATURITY FUND, INC., PUERTO RICO INVESTORS BOND FUND I, PUERTO RICO

INVESTORS TAX-FREE FUND, INC., PUERTO RICO INVESTORS TAX-FREE FUND, INC. II, PUERTO RICO INVESTORS TAX-FREE FUND III, INC., PUERTO RICO INVESTORS TAX-FREE FUND IV, INC., PUERTO RICO INVESTORS TAX-FREE FUND V, INC., PUERTO RICO INVESTORS TAX-FREE FUND VI, INC., PUERTO RICO MORTGAGE-BACKED & U.S. GOVERNMENT SECURITIES FUND, INC., TAX-FREE PUERTO RICO FUND, INC., TAX-FREE PUERTO RICO FUND II, INC., AND TAX-FREE PUERTO RICO TARGET MATURITY FUND, INC.; and THE BANK OF NEW YORK MELLON, AS FISCAL AGENT FOR THE ERS BONDS,

Movants.

**[PROPOSED] ORDER GRANTING THE JOINT URGENT MOTION TO MODIFY THE SCHEDULE FOR RESOLUTION OF THE ERS BONDHOLDER CLAIMS AND ADMINISTRATIVE EXPENSE MOTIONS**

Upon consideration of the *Joint Urgent Motion to Modify the Schedule for Resolution of the ERS Bondholder Claims and Administrative Expense Motions* (the “Motion”)<sup>7</sup>; and it appearing that (i) the Court has jurisdiction over this Urgent Motion pursuant to 28 § 1331 and 48 U.S.C. § 2166(a); (ii) that venue of this proceeding and the Motion is proper under 28 U.S.C. § 1391(b) and 48 U.S.C. § 2167(a); (iii) that notice of the Motion was adequate and proper under the circumstances and that no further or other notice need be given; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Motion is granted as set forth herein.
2. The following schedule shall apply to litigation regarding the Claims

and the Administrative Expense Motions:

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<sup>7</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.



Event	Deadline
Deadline for Government Parties and Committees to file Rule 12(b) motions to dismiss the Claims and the Administrative Expense Motions	5/6/2020
Deadline for Government Parties and Committees to respond to initial document requests with written responses and objections	5/13/2020
Deadline for Non-Party Participants to file Rule 12(b) motions to dismiss the Claims and the Administrative Expense Motions or joinders to such Rule 12(b) motions	5/13/2020
Deadline for ERS Bondholder Groups and the Fiscal Agent to file Rule 12(c) motions	6/10/2020
Deadline for Non-Party Participants to file Rule 12(c) motions or joinders to Rule 12 (c) motions	6/17/2020
Deadline for ERS Bondholder Groups and the Fiscal Agent to file oppositions to any Rule 12(b) motions	6/17/2020
Deadline for Non-Party Participants to file responses or joinders to oppositions to Rule 12(b) motions	6/24/2020
Deadline for Government Parties and Committees to file opposition to ERS Bondholder Groups and the Fiscal Agent Rule 12(c) motions	7/8/2020
Deadline for Non-Party Participants to file responses or joinders to oppositions to Rule 12(c) motions	7/15/2020
Deadline for Government Parties and Committees to file replies in support of any Rule 12(b) motions	7/15/2020
Deadline for Non-Party Participants to file responses or joinders to replies in support of any Rule 12(b) motions	7/22/2020
Deadline for ERS Bondholder Groups and the Fiscal Agent to file replies in support of any Rule 12(c) motions	8/6/2020

Event	Deadline
Deadline for Non-Party Participants to file responses or joinders to replies in support of any Rule 12(c) motions	8/13/2020
Hearing on Rule 12 motions	Date Set by Court
Deadline for completion of document discovery	30 Days After Decision on Rule 12 Motions
Subsequent to the court's ruling on the Rule 12 motions, the parties are to meet and confer regarding a schedule for any further litigation necessary to fully resolve the Claims and the Administrative Expense Motions	TBD

3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

4. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order

Dated: April \_\_\_\_, 2020.

SO ORDERED:

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HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE